

**MEMO ENDORSED**

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October 23, 2014

**VIA ECF**

The Honorable Valerie Caproni  
United States District Judge  
Southern District of New York  
40 Foley Square, Courtroom 443  
New York, NY 10007

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #:  
DATE FILED: 10/24/2014

Re: *Securities and Exchange Commission v. Revelation Capital Management, Ltd.,  
and Christopher P.C. Kuchanny*, Case No. 14 Civ. 0645

Dear Judge Caproni:

We respectfully submit this letter in the above-referenced action pursuant to Your Honor's Individual Practices to request an adjournment of the discovery deadlines and pre-trial conference date presently scheduled in this case. We are new counsel to Defendants and filed a Notice of Appearance on October 8, 2014. The Securities and Exchange Commission joins in our request.

The foremost reason for our joint request for an adjournment is the need for letters of request pursuant to Fed. R. Civ. P. 28(b) for several witnesses. Once Seward & Kissel LLP was retained, we and the SEC immediately began discussions concerning the out-of-country witnesses in this action and the best way to procure documents and testimony. At this time, at least two witnesses will not consent to comply with discovery requests without a letter of request. The parties will soon be ready to jointly submit a Fed. R. Civ. P. 28(b) application to the Court, and we understand that, once the letters of request are issued and approved and deposition dates are finalized, Canadian authorities will require several weeks advance notice before granting foreign counsel permission to enter the country to take testimony. In addition, the parties are in the midst of document collection and production efforts, and discussions thereto, and productive settlement discussions have been ongoing throughout our discovery efforts.

There have been no previous requests for adjournment or extension of time in this matter and all parties consent to the request.

The Honorable Valerie Caproni

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Below are the original dates in the Civil Case Management Plan and Scheduling Order, dated August 8, 2014 and proposed alternative dates:

	Original Date	Proposed Alternative Date
Fact Discovery Completion (§5(a))	November 6, 2014	March 5, 2015
Next Pretrial Conference (§10)	November 7, 2014	March 6, 2015
Expert Discovery Completion (§5(b))	December 22, 2014	April 22, 2015

We appreciate the Court's consideration in this matter.

Respectfully submitted,

SEWARD & KISSEL LLP  
*Attorneys for Defendants*

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Request GRANTED. The deadline for fact discovery is extended to March 5, 2015. The deadline for expert discovery is extended to April 22, 2015. The status conference scheduled for November 7, 2014, is ADJOURNED to March 6, 2015.

SO ORDERED.



HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE

October 24, 2014